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Office of Nutritional Products
Labeling & Dietary Supplements
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740-3835

October 7, 2005

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Dear Sir or Madam:

This letter will serve as a 30-day notification pursuant to Section 6 of the Dietary Supplement Health and Education Act of 1994 that NBTY Inc. is using the following statements on our supplements Hyaluronic Acid under one or more of the following brand names: American Health, Bioenergy Nutrients, Body Fortress, Giant Eagle, Good 'N Natural, Health's Finest, Heartland, HealthSmart Vitamins, HealthWatchers, Life Fitness, Life's Finest, Major Pharmaceutical, Met-Rx, Natural Wealth, Naturalist, Nature's Bounty, Nutrition Headquarters, Nutrition Warehouse, PhysioLogics, Precision Engineered, Puritan's Pride, Radiance, Rexall, Spring Valley, Sundown, US Nutrition, Vitamin Depot, Vitamin World, and WORLDWIDE Sport Nutrition:.

- Natural Component of the Body
- Hyaluronic Acid is a polymer made of repeating units of glucuronic acid and N-acetylglucosamine.
- The glucuronic acid and N-acetylglucosamine within Hyaluronic Acid are connected through Beta 1-3 and Beta 1-4 linkages.
- Hyaluronic Acid is found in all the connective tissues of the body, including the ligaments and tendons, where it plays a role in lubrication.

The above statements are accompanied by the required disclaimer pursuant to Section 6 of the Dietary Supplement Health and Education Act.

Sincerely,

Angelica S. Vrablic, Ph.D.
Manager, Nutrition Research

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